Amendments to the Drawings

New corrected/formal drawings of Figures 1-9 in compliance with 37 CFR 1.21(d) are attached as requested by the examiner.

The attached sheets of drawings includes minor changes to Figures 1, 4, and 5. The addition of 100 was added to Figure 1, the addition of 400 was added to Figure 4, and the addition of 500 was added to Figure 5. This was done to stay consistent with the other drawings. The numbers 100, 400, and 500 merely represent the portion of the overall system presented.

Furthermore, Figure 9 is accidentally missing from the original application. Support for Figure 9 can be found in paragraph [0050]. No new matter has been added.

Substitution of the attached Figures 1-9 for Figures 1-8 as filed with the application is respectfully requested.

Attachment: eight replacement sheets of drawings with Figures 1-8 respectively, and one new sheet with Figure 9.

REMARKS/ARGUMENTS

Claims 1-17 and 20-30 are pending in the application. Claims 18 and 19 have been withdrawn from prosecution. By this paper, claims 1, 6 and 7 have been amended, the drawing has been amended by providing new formal drawings and the specification has been amended. Reconsideration of the application in light of the amendments and arguments herein is respectfully requested.

A. 35 U.S.C. §102

In the office action mailed August 2, 2006, claims 1, 2, 4 and 5 were rejected under 35 U.S.C. §102(e) as being anticipated by Glass et al, US Patent Application Publication No. 2005/0060643 ("Glass").

Independent Claim 1

Glass fails to disclose all limitations of claim 1. Although applicant disagrees with the office action that the referenced portions of Glass disclose the elements of claim 1 in its original form, claim 1 is currently amended to clarify that the *document repository is automatically updated by the system.*

Applicant's arguments are based on the current amendment. As amended herein, claim 1 now reads:

> In a system including a document repository, a method comprising:
> a) determining, automatically, a level of similarity between at least two of a plurality of discrete elements stored in the document repository; and
> b) storing data representative of a link between the elements based in-part on the level of similarity;
> c) wherein said document repository is automatically updated by said system.

The document repository in Glass is <u>manually</u> updated, requiring a human to go through 'sample' documents, manually annotate specific items to look for in the document, and then manually input the 'sample' document with the tagged annotations to the database.

(see for example Fig. 2; and paragraph [0196], which states "The sample documents have been manually reviewed and annotated to distinguish document classifications..."). Thus, it is respectfully submitted that the rejections is overcome and should be withdrawn. Claims 2-6 are dependent from claim 1 and are allowable for the same reasons. For the foregoing reasons, reconsideration and allowance of claims 2-6 is respectfully requested.

B. 35 U.S.C. §103

Claims 3, 6-17 and 20-30 stand rejected under 35 U.S.C. § 103 as being unpatentable over Glass in view of US patent publication number 2005/0060643 to Wical ("Wical"). Reconsideration of this rejection is respectfully requested.

It appears that there is a typo in the office action that causes mis-numbering of responses to the claims in the office action dated August 2, 2006 beginning with claim 5. The office action states: 'as to claim 4, Glass teaches the invention substantially as claimed. Glass further teaches that the document repository includes at least two physical repositories.' However, this is a limitation of claim 5, not of claim 4. Accordingly, it appears the office action is referencing the claim 7 limitations when discussing claim 6. The remainder of these remarks will proceed according to this understanding.

Independent Claim 7

The cited references fail to disclose all limitations of claim 7. In the office action dated August 2, 2006, it was stated:

> As to claim 6 [sic], Glass and Wical teach the invention substantially as claimed. Wical further teaches retrieving a plurality of documents from a document repository [col. 23, lines 1-54]; segmenting at least two documents of the plurality of documents into a plurality of conceptually meaningful segments [groups IA, IB, IIA, col. 23, lines 1-53-4]; determining if a segment of one document is related to a segment of another document and storing data representative of the relationship [col. 24, lines 56 to col. 25, lines 6; 2,3,10 of fig. 4; 8 of fig. 9A; 8 of fig. 9b].

No specific passages within Glass are cited in the office action as disclosing any feature of claim 7. However, even if some passages could be cited for their disclosure, Glass and Wical, taken alone or in combination, fail to disclose all the limitations of independent claim 7. For example, claim 7 has been amended to clarify that 'said document

repository may contain documents of various types.' In contrast to the cited references, claim 7 extends to various types of documents stored within a repository.

None of the cited references include a limitation of including documents of various types.

Wical discloses a knowledge base search and retrieval system where a term or group of terms can manually be inputted and the system will look through the documents to determine which of these documents include the terms in the query. (See for example, Abstract; col. 2, lines 42-47 which states "Factual or document knowledge base query processing in a search and retrieval system identifies in response to a query, a plurality of documents relevant to the query."). The 'documents' in Wical's knowledge base are limited to being of the same type. A knowledge base typically contains a number of documents with known facts. These 'known facts' are presented in a knowledge base to assist others when facing similar issues. Documents within a knowledge base are of the same type. Thus, it would not be obvious to extend Wical to include documents of different types.

Glass also does not disclose this feature. Glass is limited to email messages. (see Abstract which says "In a preferred embodiment the invention may be used to classify email messages in support of a message filtering or classification objective"). The main aspect in Glass is determining whether or not an incoming email is spam, not to determine whether changes in one document affect other documents as in the current invention. Glass checks emails as they come in against a group of manually set and configured 'sample' emails to determine if the incoming email is spam. Additionally, the attachments to an email message are not opened and checked for content. (paragraphs 0263-0265). Since the contents of an email message are limited to text, it would not be obvious to extend Glass to include documents of different types. Furthermore, unlike claim 7 which may contain documents of various types, Glass is limited to reviewing the text within an email message and looking for an exact match in one of the sample email messages. Thus, it would not be obvious to extend Glass to include documents of different types.

Claim 7 has further been amended for clarification. Claim 7 now includes, in part, "determining if a segment of one document is related to a segment of another document, the one document is of a first type and the other document is of either a first

type or of a second type." Neither Wical nor Glass disclose this feature. Wical doesn't store different types of documents in its knowledge base much less compare segments of one type of document with segments of a different type of document. Similarly, Glass fails to teach this feature. Glass is limited to storing manually set and annotated sample emails and comparing the text to a new incoming email. Furthermore, Glass looks for duplicates or near duplicates ((See for example, Abstract, paragraph 0002).). In contrast, claim 7 can search for meaningful segments within a document and compare those segments with segments of a different type of document for similarities.

For the foregoing reasons, the rejection of claim 7 should be withdrawn. Claims 8-17 are dependent from claim 7 and are allowable for the same reasons. For the foregoing reasons, withdrawal of the rejection of dependent claims 8-17 is respectfully requested.

Independent Claim 20

Similarly, the cited references fail to disclose all limitations of claim 20. The office action states: 'as to claims 7, 8, and 20, all limitations of these claims have been addressed in the analysis of 3 and 6 above, and these claims are rejected on that basis.' However, no actual references within Glass are stated. With respect to claim 3, the office action states:

> As to claim 3, Glass teaches the invention substantially as claimed, with the exception of retrieving a document from the repository a document from the repository and determining a document type and a physical structure for the document; and identifying one or more conceptually meaningful segments (elements) within the document based on at least one of the document type and the physical structure. Wical teaches retrieving a document from the repository [ab] and determining a document type and a physical structure for the document; and identifying one or more conceptually meaningful segments 9elelemnts) within the document based on at least one of the document type and the physical structure [processing documents in the content processing system that associates terms of the documents with categories of classification system, col. 4, lines 4-62; col. 9, lines 64-col 11, lines 12; col. 14, lines 56 to col. 16, lines 38].

With respect to claim 6, the office action states:

As to claim 6, Glass and Wical teach the invention substantially as claimed. Wical further teaches retrieving a plurality of documents from a document repository [col. 23, lines 1-54]; segmenting at least two documents of the plurality of documents into a plurality of conceptually meaningful segments [groups IA, IB, IIA, col. 23, lines 1-53-4]; determining if a segment of one document is related to a segment of another document and storing data representative of the relationship [col. 24, lines 56 to col. 25, lines 6; 2,3,10 of fig. 4; 8 of fig. 9A; 8 of fig. 9b].

Neither references point to any specific passage in Glass. However, even if some passages could be cited for their disclosure, Glass and Wical, taken alone or in combination, fail to disclose all the limitations of independent claim 20. For example, no mention or reference of the limitation 'a memory configured to store data representative of a link between at least one segment and one selected from the group comprising the plurality of segments and plurality of documents' is given. The office action does not cite any language from either Glass or Wical as showing, describing or suggesting this limitation. This feature is unique to claim 20.

Wical is limited to a knowledge base system that can search for specific words within a document. Wical does not include 'a memory configured to store data representative of a link between at least one segment and one selected from the group comprising the plurality of segments and plurality of documents.' A user inputs a search and Wical retrieves the documents that include the terms within that search. Nothing more. Glass also does not disclose this feature.

Glass is limited to searching new incoming email against a repository of manually set sample emails. Glass does not disclose a memory configured to store data representative of a link between segments. Furthermore, since Glass is limited to determining whether incoming email includes the exact text found in a sample message, it would not be obvious to extend Glass to include a memory linking tool.
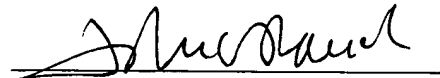
Thus, it is respectfully submitted that the rejection of claim 20 is overcome and should be withdrawn. Claims 21-30 are dependent from claim 20 and are allowable for the same reasons. For the foregoing reasons, withdrawal of the rejection of dependent claims 21-30 is respectfully requested.

CONCLUSION

With this response, the application is believed to be in condition for allowance. Should the examiner deem a telephone conference to be of assistance in advancing the application to allowance, the examiner is invited to call the undersigned attorney at the telephone number below.

Respectfully submitted,

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